

HOFLAND & TOMSHECK
Joshua Tomsheck, Esq.
State Bar of Nevada No. 009210
josht@hoflandlaw.com
228 South 4th Street, 1st Floor
Las Vegas, Nevada 89101
(702) 895-6760
(702) 731-6910 facsimile
Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA

Plaintiff,

vs.

VINCENT SULLIVAN,

Defendant.

Case No.: 2:20-cr-00299-GMN-EJY

**Stipulation and Order to Continue
Sentencing
(Fifth Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between JASON M. FRIERSON,
United States Attorney, and KIMBERLY ANNE SOKOLICH, ESQ., Assistant United States
Attorney, counsel for the United States of America, and JOSHUA TOMSHECK, ESQ.,
counsel for Defendant VINCENT SULLIVAN, that the Sentencing and Disposition currently
scheduled for February 22, 2023 at 11:00 a.m. be continued for a period of one (1) week to a
date convenient for the Court.

This stipulation is entered into for the following reasons:

1. This is the fifth Sentencing and Disposition continuance request.
 2. The defendant has a medical issue that makes the current setting not viable. The Defendant tested positive for COVID-19 about three weeks ago. About a week after the positive result, the Defendant's symptoms became severe. The Defendant developed an infection in his lungs and is currently on medication including

1 antibiotics for the infection. While "it is in remission" it is expected that he should
2 return to full health. On February 20, 2023, Defendant still tested positive for
3 COVID-19.

- 4 3. The parties agree to the continuance.
5 4. The defendant is not in custody and does not object to this continuance.
6 5. Additionally, denial of this request for continuance could result in a miscarriage
7 of justice.
8 6. For the above stated reasons, the parties agree that a continuance of the Sentencing
9 and Disposition would best serve the ends of justice in this case.

10 DATED this 22nd day of February, 2023.

11 Respectfully submitted,

12 HOFLAND & TOMSHECK

13 /s/ Joshua Tomsheck
14 JOSHUA TOMSHECK, ESQ.
15 Counsel for Defendant
16 VINCENT SULLIVAN

17 JASON M. FRIERSON
18 United States Attorney

19 /s/ Kimberly Anne Sokolich
20 KIMBERLY ANNE SOKOLICH, ESQ.
21 Assistant United States Attorney

HOFLAND & TOMSHECK
Joshua Tomsheck, Esq.
State Bar of Nevada No. 009210
josht@hoflandlaw.com
228 South 4th Street, 1st Floor
Las Vegas, Nevada 89101
(702) 895-6760
(702) 731-6910 facsimile
Attorney for Defendant

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

UNITED STATES OF AMERICA

Plaintiff,

VS.

VINCENT SULLIVAN,

Defendant.

Case No.: 2:20-cr-00299-GMN-EJY

**Stipulation and Order to Continue
Sentencing
(Fifth Request)**

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. This is the fifth Sentencing and Disposition continuance request.
2. The defendant has a medical issue that makes the current setting not viable. The Defendant tested positive for COVID-19 about three weeks ago. About a week after the positive result, the Defendant's symptoms became severe. The Defendant developed an infection in his lungs and is currently on medication including antibiotics for the infection. While "it is in remission" it is expected that he should return to full health. On February 20, 2023, Defendant still tested positive for COVID-19.

3. The parties agree to the continuance.

4. The defendant is not in custody and does not object to this continuance.
5. Additionally, denial of this request for continuance could result in a miscarriage of justice.
6. For the above stated reasons, the parties agree that a continuance of the Sentencing and Disposition would best serve the ends of justice in this case.

ORDER

IT IS HEREBY ORDERED, that Sentencing and Disposition currently scheduled for February 22, 2023 at 11:00 a.m. be continued to 7th day of March, 2023 at 11:00 A.M.

DATED 22 day of February, 2023.

~~UNITED~~ STATES DISTRICT JUDGE

Respectfully Submitted By:

/s/ Joshua Tomsheck
Joshua Tomsheck, Esq.
Nevada Bar No. 009210
Attorney for Defendant